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Attorneys for All Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SHARP CORPORATION,

Plaintiff,

v.

HISENSE CO., LTD.; HISENSE USA
CORPORATION; HISENSE ELECTRIC
CO., LTD.; and HISENSE USA
MULTIMEDIA R&D CENTER, INC.;
HISENSE INTERNATIONAL (HONG
KONG) AMERICA INVESTMENT CO.,
LTD.; and DOES 1-100,

Defendants.

No. 3:17-cv-03341-YGR

**DECLARATION OF DAVID G. HILLE
IN SUPPORT OF MOTION TO COMPEL
ARBITRATION AND STAY THE
PROCEEDINGS OR, ALTERNATIVELY,
DISMISS THE ACTION**

Date: July 25, 2017

Time: 2:00 p.m.

Courtroom: 1

Judge: Yvonne Gonzalez Rogers

DECLARATION OF DAVID G. HILLE

I, David G. Hille, declare:

1. I am a partner of the law firm of White & Case LLP, attorneys of record in this action for defendants Hisense Co., Ltd. (“Hisense”), Hisense USA Corporation (“Hisense USA”), Hisense Electric Co., Ltd. (“Hisense Electric”), Hisense USA Multimedia R&D Center, Inc. (“Hisense USA Multimedia”), and Hisense International (Hong Kong) America Investment Co., Ltd. (“Hisense International”) (and collectively “Defendants”). I submit this Declaration in support of Defendants’ Motion to Compel Arbitration and Stay the Proceedings or, Alternatively, Dismiss the Action. I have personal knowledge of the following facts, and if called as a witness I could and would competently testify thereto.

2. Attached as **Exhibit A** is a true and correct copy of the Trademark License Agreement (“TLA”) by and between Plaintiff Sharp Corporation (“Sharp”) and Defendant Hisense International, dated July 31, 2015. The terms of the TLA are redacted in compliance with the TLA’s confidentiality provision.

3. Attached as **Exhibit B** is a true and correct copy of the Notice of Arbitration filed by Hisense International (Hong Kong) America Investment Co., Limited in *Hisense International (Hong Kong) America Investment Co., Limited v. Sharp Corporation*, ARB No. 110 of 2017, before the Singapore International Arbitration Centre on April 24, 2017.

4. Attached as **Exhibit C** is a true and correct copy of the Response to the Notice of Arbitration filed by Sharp Corporation in *Hisense International (Hong Kong) America Investment Co., Limited v. Sharp Corporation*, ARB No. 110 of 2017, before the Singapore International Arbitration Centre on May 8, 2017.

5. Attached as **Exhibit D** is a true and correct copy of the Order for Emergency Interim Relief entered in *Hisense International (Hong Kong) America Investment Co., Limited v. Sharp Corporation* before the Singapore International Arbitration Centre on May 9, 2017.

6. Attached as **Exhibit E** is a true and correct copy of the complaint filed on May 12, 2017 in the Supreme Court of the State of New York, styled *Sharp Corporation v. Hisense Co., Ltd., et al.*, Case No. 652589/2017.

8. Attached as **Exhibit G** is a true and correct copy of a response letter, dated 25 May 2017, from Drew & Napier LLC to White & Case LLP.

/s/ David G. Hille
David G. Hille